

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

EARRIOUS MOORE and EBONY
GILMORE, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

HEALTHCARE SERVICES GROUP, INC.,
a Pennsylvania corporation,

Defendant.

Case No. 1:17-cv-8163

Hon. Judge Amy J. St. Eve

Hon. Magistrate Judge Maria Valdez

MOTION TO STAY PROCEEDINGS

Healthcare Services Group, Inc., by and through undersigned counsel, hereby moves to stay this case pending the United States Supreme Court's decision in the matter captioned *Epic Systems, Corp. v. Lewis*, No. 16-285, and the Illinois Appellate Court's decision in the matter captioned *Six Flags Entertainment Corp. v. Rosenbach*, No. 2-17-0317 (Ill. App. 2nd. Dist.), and to exclude this matter from the Mandatory Initial Discovery Pilot Project. The grounds for this Motion are set forth in Healthcare Services Group's Memorandum of Law in Support of its Motion to Stay Proceedings (the "Memorandum"), filed contemporaneously herewith.

WHEREFORE, for the reasons set forth in its Memorandum, Healthcare Services Group, Inc. respectfully requests this Honorable Court to: (i) enter a temporary stay of all proceedings in this action pending the United States Supreme Court's final disposition of *Epic Systems Corp. v. Lewis*, No. 16-285 and the Illinois Appellate Court's decision in the matter captioned *Six Flags Entertainment Corp. v. Rosenbach*, No. 2-17-0317 (Ill. App. 2nd. Dist.), (ii) excuse this case from the Mandatory Initial Discovery Pilot Program, and (iii) award all other relief it deems equitable and just.

Dated: November 17, 2017

**BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP**

By: /s/ David S. Almeida

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Counsel for Healthcare Services Group, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed with the Clerk of the Court and that copies of the foregoing were transmitted to all parties of record via the Court's CM/ECF electronic filing system.

/s/ David S. Almeida